

MISC

**ICC Dkt No. 06-0370
Barth v AmerenCIPS
Attach 4**

Procedure: Suspected Fraud - Miscellaneous

Frequency: As Needed

Purpose: To verify accurate information for the customer of record when there is suspicion of fraud on an account.

Special Notes: Suspected fraud is due to accounts in possible minor's, deceased or fraudulent (persons that did not give permission or that are unaware service was put into their name) names or social security numbers.

I Finding out about Fraudulent Activity

- A Customer's find out about fraud in numerous way. Here are some examples.
- 1 They call to get new service with us
 - 2 They receive a final bill in the mail
 - 3 Someone tells them (family, friend, etc.)
 - 4 Collection agency calls
 - 5 Shows up on their credit report
 - 6 Get mail from collection agencies
- B Credit finds out about fraud numerous ways. Here are some examples.
- 1 WFM's sent to credit as a result of a phone call from the customer
 - 2 "No Credit Information" message from hitting the Credit Score Button
 - 3 Police reports that are faxed
 - 4 Phone calls from police departments
 - 5 Collection agencies

II Suspected Fraud – Miscellaneous

- A Suspected Fraud on Active Accounts
- 1 CSR's made aware of fraud by customer.

- 2 At **AmerenCILCO & CIPS**, the CSR's will:
 - a Advise the customer that 2 forms of ID will need to be faxed to credit if they want new service.
 - b Have the customer request a disconnection at the premise in question. If customer doesn't request a disconnection, proceed to **Step III**.
 - c Have the customer file a police report with the police department in the city or county that the fraud was committed in.
 - i Any police department will take a police report for identity theft, but if it is out of their jurisdiction, they cannot investigate it, so that's why CSR's encourage them to file a report near the town that the fraud happened in.
 - d Send a WFM to Credit letting them know about fraud situation and asking for a "FTC Fraud Packet" to be mailed to the customer. If WFM doesn't mention Fraud Packet, credit needs to go ahead and send the packet anyway. **Special Note:** Credit needs the police report and/or the fraud packet to investigate the fraud situation and to possibly remove the customer from the responsibility of paying for the account.
 - i Fraud Packets are found in O:\Credit and Collection\Fraud-IDs\Fraud Packet\CIPS\Fraud Affidavit12.pdf. Cover letters for the Fraud Packets are found in O:\Credit and Collection\Fraud-IDs\Fraud Packet\CIPS\Fraud Packet Cover Ltr – Booklet Only
- 3 At **AmerenIP**, the CSR's will:
 - a Have the customer request a disconnection at the premise in question.
 - b If Customer does not request a disconnection, send a WFM to Credit letting them know about fraud situation, including customer's phone number. IP Credit will inform the customer to file a police report with the police department in the city or county that the fraud was committed in.
 - i Any police department will take a police report for identity theft, but if it is out of their jurisdiction, they cannot investigate it, so that's why CSR's encourage

them to file a report near the town that the fraud happened in.

- c Send a WFM to Credit letting them know about fraud situation and asking for a "FTC Fraud Packet" to be mailed to the customer. If WFM doesn't mention Fraud Packet, credit needs to go ahead and send the packet anyway. AmerenIP Credit will send this packet Certified Mail.

- d **Special Note:** Credit needs the police report and/or the fraud packet to investigate the fraud situation and to possibly remove the customer from the responsibility of paying for the account.

- i Fraud Packets are found in O:\Credit and Collection\Fraud-IDs\Fraud Packet\CIPS\Fraud Affidavit12.pdf. Cover letters for the Fraud Packets are found in O:\Credit and Collection\Fraud-IDs\Fraud Packet\CIPS\Fraud Packet Cover Ltr – Booklet Only

- 4 Credit receives police report and/or fraud packet – Proceed to **Section IV.**

- 5 Customer does not send in police report.

- a If police report and/or fraud packet are not returned, will let Final Bill accounts to continue through the collection timeline and charge off to a collection agency, and Charge Off accounts will stay at the collection agency. Customer will not get new service if they are requesting it until credit received a police report with a Case number and/or 2 forms of ID are sent, or bill is paid.

B Suspected Fraud on Final Bill or Charged Off Accounts

- 1 CSR's made aware of fraud by customer. They will handle by:

- 2 At **AmerenCILCO & CIPS**, the CSR's will:

- a Advise the customer that 2 forms of ID will need to be faxed to credit if they want new service.
- b Have the customer request a disconnection at the premise in question. If customer doesn't request a disconnection, proceed to **Section III.**
- c Have the customer file a police report with the police department in the city or county that the fraud was committed in.

- i Any police department will take a police report for identity theft, but if it is out of their jurisdiction, they cannot investigate it, so that's why CSR's encourage them to file a report near the town that the fraud happened in.
 - d Send a WFM to Credit letting them know about fraud situation and asking for a "FTC Fraud Packet" to be mailed to the customer. If WFM doesn't mention Fraud Packet, credit needs to go ahead and send the packet anyway. **Special Note:** Credit needs the police report and/or the fraud packet to investigate the fraud situation and to possibly remove the customer from the responsibility of paying for the account.
 - i Fraud Packets are found in O:\Credit and Collection\Fraud-IDs\Fraud Packet\CIPS\Fraud Affidavit12.pdf. Cover letters for the Fraud Packets are found in O:\Credit and Collection\Fraud-IDs\Fraud Packet\CIPS\Fraud Packet Cover Ltr – Booklet Only
- 3 At **AmerenIP**, the CSR's will:
- a Have the customer request a disconnection at the premise in question.
 - b If Customer does not request a disconnection, send a WFM to Credit letting them know about fraud situation, including customer's phone number. IP Credit will inform the customer to file a police report with the police department in the city or county that the fraud was committed in.
 - i Any police department will take a police report for identity theft, but if it is out of their jurisdiction, they cannot investigate it, so that's why CSR's encourage them to file a report near the town that the fraud happened in.
 - c Send a WFM to Credit letting them know about fraud situation and asking for a "FTC Fraud Packet" to be mailed to the customer. If WFM doesn't mention Fraud Packet, credit needs to go ahead and send the packet anyway. AmerenIP Credit will send this packet Certified Mail.
 - d **Special Note:** Credit needs the police report and/or the fraud packet to investigate the fraud situation and to

possibly remove the customer from the responsibility of paying for the account.

- i Fraud Packets are found in O:\Credit and Collection\Fraud-IDs\Fraud Packet\CIPS\Fraud Affidavit12.pdf.
Cover letters for the Fraud Packets are found in O:\Credit and Collection\Fraud-IDs\Fraud Packet\CIPS\Fraud Packet Cover Ltr – Booklet Only
- 4 For Customer sends in police report. Proceed to **Section IV.**
- 5 Customer does not send in police report.
 - a If police report and/or fraud packet are not returned, will let Final Bill accounts to continue through the collection timeline and charge off to a collection agency, and Charge Off accounts will stay at the collection agency. Customer will not get new service if they are requesting it until credit received a police report with a Case number and/or 2 forms of ID are sent, or bill is paid.

III Issuing Disconnect Notice and follow-up

- A If account isn't already scheduled for disconnection credit can get account disconnected in two different ways.
 - 1 Send out a friendly letter asking for records to be updated. Do this only if account status is in good standing (A or B credit rating) or if immediate action is not required. Otherwise proceed to option b – sending and 8 day disconnection notice for ID.
 - a Letter is located in O:\Credit and Collection\Deceased\Letters\CIPS\Letter to update records on account.
 - b Fill in the name, account number, and service address information to finish letter.
 - c Make 2 copies of letter.
 - d Take one copy of letter and send to premise by using mailing address on account
 - e Take the other copy and put in a day file for 8 business days.
 - f Put a contact on the account.
 - i From the **Account** window click the "Contact" icon located at the bottom of the window

- ii In the **Add Contact** section click the "Account" button
 - iii In the **Contact Type** field click the dropdown arrow and select "Mail Correspondence" from the list
 - iv In the **Comments** field type in that we are sending out a letter to update records. Explain why we are sending the out the letter. Note that we need 2 forms of ID from anyone who calls regarding the letter if they are wanting the service to remain connected.
 - v In the **Critical Contact** section
 - 01 Put a checkmark in the "Yes" box by clicking inside the box
 - 02 In the **Expiration Date** field enter the expiration date 2 months into the future
 - vi Click the "Enter" button located at the bottom of the window
 - vii From the **Contact** menu select "Process"
 - g If no response on 8th business day to letter, proceed to step ii and send out an 8 day disconnect notice for ID.
- 2 Send out an 8 day disconnect notice for ID. If you are issuing the notice yourself see Procedure Manual "Preparing Manual Disconnect Notices" and then proceed to **Section III Step 3**. If you need someone else to issue the notice then proceed to the next step.
- a Make 2 screen prints of the **Account** screen.
 - b Take 1st screen print and write on it that you want an 8 day disconnect notice for ID
 - c Put a mailing address on the screen print if there is one that is different from the service address.
 - d Give to the appropriate person to prepare the disconnect notice
 - e This person will give the notice back to you or to the appropriate section to follow up on and schedule a disconnection.
 - f Take the 2nd screen print and make a note on it that you have sent the account an 8 day disc. notice for ID.
- 3 Make a contact on the account.
- a From the **Account** window click the "Contact" icon located at the bottom of the window

- b From this screen select "Add Account Contact"
 - c In the **Contact Type** field click the dropdown arrow and select "Revenue Protection" from the list
 - d In the **Comments** field type in that we are sending out an 8 day disc. notice for ID and why. Include all pertinent information about the fraud that you can. List any suspects and account #'s associated with those suspects. Note that we need ID from anyone who calls regarding the disconnection notice.
 - e In the **Critical Contact** section
 - i Put a checkmark in the "Yes" box by clicking inside the box
 - ii In the **Expiration Date** field enter the expiration date 2 months into the future
 - 01 From the **Contact** menu select "Enter"
 - 02 From the **Contact** menu select "Process"
 - f File the notice or screen print in a day file for 8 business days.
- 4 On the 8th business day, pull the notice to see if a disconnection has been worked yet or if anyone has called concerning the account.
- a If no disconnect or calls then it is time to issue a Cut Out for Non Pay service order. If issuing yourself, see Procedure **Issuing a Fraud Cut** for instructions. If not issuing yourself then give to the appropriate person in Credit to perform cut order.
 - b Once Cut Out has been performed and:
 - i CSR's never receive a phone call or 2 forms of ID from someone wanting service. We are to assume that no one is at premise anymore. Account will go to final status and eventually write off. No need to keep watching account.
 - ii CSR's get a call from someone wanting service and they advise that person that 2 forms of ID need to be faxed to credit.
 - iii Credit receives ID's – See "Working ID's" Procedure.
 - iv Credit approved ID's and new customer accepts responsibility of bill.

- a Proceed to **Section V.**
- v Credit approved ID's, but the new customer does not accept responsibility of bill. If customer doesn't accept responsibility for any account we feel he/she is responsible for, the account will be sent on to collection agency and may need to be pursued in court.

IV Investigating Police Reports and Fraud Packets

- A Active, Final Bill and Charged Off Accounts
 - 1 Read over the whole police report and/or fraud packet for full understanding of how the fraud took place. Take note of any specific names, or other clues to help the investigation.
 - 2 If a suspect is listed or not, investigate the following:
 - a Call the police department that took the report. See if they have investigated the suspect yet and how far they are with their investigation. Sometimes the police departments haven't even begun to investigate the fraud. It's always a good idea to periodically keep in touch with them until the case is closed.
 - b Start with the premise address. Look at the notes on the account that had the fraud committed on it. Are there names of anyone in the notes other than the account holder? Look at the previous tenant notes. Are there any name of anyone who tried to get service before it went into the customer's name fraudulently?
 - c Check the phone number on the customer's account. Does it bring back any other accounts with the same phone number? If so, investigate those accounts to see if there is a connection.
 - d Find out who the Landlord is for the premise and call them. Make note before you call them what the service dates on the account are so you can give them a timeframe to look at with the rent receipts they will have. Landlords usually keep good records and they are the best way to locate who lived at the premise during a specific timeframe.
 - i Note: If the Landlord knows who lived there, then you may know who is responsible for the bill. Remember,

not everyone who is listed on a rental application is the one who might have committed the fraud. If you have a suspect and the Landlord confirms that the suspect lived there then you will need to give this information to the police department.

- e If you have a name for a suspect, search the suspects name in CSS to see if they any accounts with us. If you know a spouse name of the suspect, also try that name in CSS.
 - f If you have a Social Security number for a suspect, run a skip trace through Equifax. See "Equifax" procedure. You can also run skip traces through ACCURINT or TransUnion. A skip trace may help pinpoint if the suspect was truly at the premise in question.
 - i ACCURINT skip traces can only be accessed through your supervisor or through those given access from the supervisor. You will need to give the person running Accurint the name, and social security number of the suspect. In most cases you maybe able to find information without a social security number.
 - ii TransUnion skip traces are available through United Adjustment Collection Agency. Their phone number is (618) 529-3813. You will need the name, social security number, and an address of the suspect. Any address that you have on the suspect will work.
 - g Did the customer receive LIHEAP?
 - i If yes, then the customer will be held responsible for the account. When a customer receives LIHEAP funding, that means that they have went down to the office in person to apply. When they apply they have to provide ID to show who they are. Basically, if they received LIHEAP, they knew the account was in their name and therefore are responsible for the account.
 - ii Proceed to **Section V**.
- 3 Has it been determined that a **suspect** is responsible for the bill? Does the police department have a suspect that they are going to prosecute? If so, proceed to **Section VI**, and then proceed to **Section V** and just do the Suspect section.

- 4 Has it been determined that the **customer** is responsible for the bill? Does the police department believe that the customer is responsible? If so, proceed to **Section V**.

V Holding Customers and/or Suspects Responsible for Fraud

- A If it has been determined by credit or the police department through investigations that the **customer** will be responsible for the account, then credit will do the following:
 - 1 If account status is **final bill** then the account will continue through the collections timeline or be transferred to an active account.
 - 2 If the account status is "Charged Off" then the account will stay with the collection agency or be transferred to an active account.
- B If it has been determined by credit or the police department through investigations that the **suspect** will be responsible for the account, then credit will do the following.
 - 1 If suspect has an active account, then credit will transfer the fraud account into their active account. CSR should send a WFM to do this. (At AmerenIP credit will be handling this from the beginning so no CSR interaction would be needed).
 - 2 If suspect has a Final Bill or Charged Off account, credit will need to send a Miscellaneous Customer Accounts WFM to establish a Non-Service account in the name of the responsible party and to move the \$\$ over so that we can bill that customer.
- C Put a contact on the account
 - 1 From the **Account** window click the "Contact" icon located at the bottom of the window
 - 2 In the **Add Contact** section click the "Account" button
 - 3 In the **Contact Type** field click the dropdown arrow and select "Credit Issues" from the list
 - 4 In the **Comments** field type in that we are holding someone responsible for the account and what we are doing with the account.
 - 5 In the **Critical Contact** section
 - a Put a checkmark in the "Yes" box by clicking inside the box

- b In the **Expiration Date** field enter the expiration date 7 years into the future
- 6 Click the "Enter" button located at the bottom of the window
- 7 From the **Contact** menu select "Process"

VI Not Holding Customer Responsible for Fraud

- A Customer, or Minor is not being held responsible for Fraud, and police department or credit has not found a suspect
 - 1 Put a contact on the account
 - a From the **Account** window click the "Contact" icon located at the bottom of the window
 - b In the **Add Contact** section click the "Account" button
 - c In the **Contact Type** field click the dropdown arrow and select "Credit Issues" from the list
 - d In the **Comments** field type in the person who committed the fraud. Note any pertinent information given to you by the police department about how they will handle the fraud. Make note that you will be coding the account "Judgement" and if the account status is Final, you will be writing off the account or if the account status is "Charged Off" you remove the account from the collection agency and then re-writing it off again.
 - e In the **Critical Contact** section
 - i Put a checkmark in the "Yes" box by clicking inside the box
 - ii In the **Expiration Date** field enter the expiration date 7 years into the future
 - f Click the "Enter" button located at the bottom of the window
 - g From the **Contact** menu select "Process"
 - 2 Code the account "Judgement"
 - a From the **Account** window select **Actions/Account Actions /Collections/Maintain Credit Information**.
 - b In the **Debtor Information** section click the dropdown box in the **Debtor Type** field and select "Judgement" from the list.
 - c In the **Debtor Date** field enter the current date.

- d From the **Credit** menu select "Process"
- 3 Remove the account from the collection agency and re-write off the account – **Charged Off Status Accounts Only**
 - a If the account is in "Charged Off" status, credit will need to remove the account from the collection agency, reinstate the account, and Write Off the account. This process will take 3 business days.
 - i On the 1st business day, Reinstate the account
 - 01 From the Account window select Actions/Account Actions/Accounts Receivable/Write off/Reinstate Product
 - 02 Under "Action" the radio button choose "Reinstate"
 - 03 Select "Process"
 - ii On the 2nd business day, Remove the account from the collection agency
 - 01 Select Actions/Account Actions/Collections/Maintain Credit Information.
 - 02 Under "Agency Details", click on the box "Remove from Agency"
 - 03 Select "Process"
 - iii On the 3rd business day, write off the account
 - 01 Select Actions/Account Actions/Accounts Receivable/Write off/Reinstate Product
 - 02 Under "Action" the radio button will already be defaulted to "Write Off"
 - 03 Select "Process"
- 4 Write off the account – **Final Bill Status Accounts Only**
 - a Select Actions/Account Actions/Accounts Receivable/Write off/Reinstate Product
 - b Under "Action" the radio button will already be defaulted to "Write Off"
 - c Select "Process"
- 5 If there is a suspect, you will have to go back to Section **VI** and proceed with just Suspect section.

VII Filing Frauds

- A Frauds are kept at credit personnel's desk while they are working the fraud. After the fraud case is closed, they are filed in credit's Customer Correspondence files located in the file cabinet in credit.

Acceptable Forms of Identification

Valid Driver's License or State ID Card
Commercial Driver's License(CDL)
Firearm Owners ID(FOID)
Birth Certificate
Visa (used to get into the U.S.)
Passport (used to get into the U.S.)
Student ID
Current payroll and check stub
Previous years tax return
W-2 Wage & tax statement for previous year
Social Security Card
Military ID
Matricular Consular Card ***and*** Permanent Resident Card (counts only as 1 ID)